

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

SILVON S. SIMMONS,

*Plaintiff,*

-vs-

JOSEPH M. FERRIGNO, II, SAMUEL  
GIANCURSIO, MARK WIATER, CHRISTOPHER  
MUSCATO, ROBERT WETZEL, MICHAEL L.  
CIMINELLI, JOHN DOES 1-20, CITY OF  
ROCHESTER, SHOTSPOTTER, INC., SST, INC.,  
JOHN DOES 21-30, and PAUL C. GREENE,

*Defendants.*

---

**DECLARATION OF THOMAS  
CRONMILLER IN SUPPORT OF  
PETITION/MOTION TO ADMIT  
JORDAN TRENT JONES  
BENJAMIN MAX KLEINMAN,  
AND JON MICHAELSON  
*PRO HAC VICE***

Civil Action No. 6:17-cv-6176-MAT

I make this declaration under penalties of perjury:

1. I am an attorney licensed to practice in the State of New York and in this Court and am a partner with Barclay Damon, LLP, attorneys for Defendants Shotspotter, Inc., SST, Inc., and Paul C. Greene ("Shotspotter Defendants"). I am fully familiar with the facts and circumstances of this action.

2. I submit this declaration in support of Shotspotter Defendants' application for an Order, pursuant to Local Civil Rule 83.1(c) of the United States District Court of the Western District of New York, granting Jordan Trent Jones, Esq., Benjamin Max Kleinman, Esq., and Jon Michaelson, Esq., *pro hac vice* admission to this Court to act as counsel for Shotspotter Defendants for purposes of participating in, arguing, and trying the above-captioned action.

3. As set forth in his contemporaneously filed Affidavit, Mr. Jones is a Partner of the firm of Kilpatrick Townsend & Stockton LLP, and he practices in the firm's Menlo Park, California office, located at 1080 Marsh Road, Menlo Park, California 94025. Mr. Jones received his juris doctor degree in 1993 from the University of California at Los Angeles, School

of Law. He has been admitted to the practice of law in the State of California since 1993, and is also admitted to practice in the California District Courts (Central, Northern, Eastern, and Southern). He is also admitted to practice in the United States District Court for the District of Columbia, the United States District Court for the Eastern District of Texas, and the United States District Court for the District of Colorado, as well as the United States Court of Appeals for the Federal Circuit and the United States Court of Appeals for the Ninth Circuit.

4. I have known Mr. Jones since October 1, 2018. Mr. Jones is an attorney in good standing with the bar courts listed above. He has never been disciplined, and there are no disciplinary proceedings pending against him. Mr. Jones has read and is familiar with the authorities identified in Local Rule 81.1(b)(5), and he agrees to abide by the New York State Lawyer's Code of Professional Responsibility.

5. There has been no prior application in this action for the relief requested herein.

6. As set forth in his contemporaneously filed Affidavit, Mr. Kleinman is an Associate of the firm of Kilpatrick Townsend & Stockton LLP, and he practices in the firm's San Francisco, California office, located at Two Embarcadero Center Suite 1900, San Francisco, California 94111. Mr. Kleinman received his juris doctor degree in 2008 from New York University School of Law. He has been admitted to the practice of law in the State of California since 2008, and is also admitted to practice in the California District Courts (Central, Northern, Eastern, and Southern). He is also admitted to practice in the United States Court of Appeals for the Federal Circuit and the United States Court of Appeals for the Ninth Circuit.

7. I have known Mr. Kleinman since October 1, 2018. Mr. Kleinman is an attorney in good standing with the bar courts listed above. He has never been disciplined, and there are no disciplinary proceedings pending against him. Mr. Kleinman has read and is familiar with the

authorities identified in Local Rule 81.1(b)(5), and he agrees to abide by the New York State Lawyer's Code of Professional Responsibility.

8. There has been no prior application in this action for the relief requested herein.

9. As set forth in his contemporaneously filed Affidavit, Mr. Michaelson is a Partner of the firm of Kilpatrick Townsend & Stockton LLP, and he practices in the firm's Menlo Park, California office, located at 1080 Marsh Road, Menlo Park, California 94025. Mr. Michaelson received his juris doctor degree in 1978 from the University of California, Boalt Hall School of Law. He has been admitted to the practice of law in the State of California since 1978, and is also admitted to practice in the California District Courts (Central, Northern, and Eastern) and the United States District Court for the District of Colorado. He is also admitted to practice in the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court. Mr. Michaelson has been admitted pro hac vice in the United States District Courts for the District of Connecticut and District of Nevada.

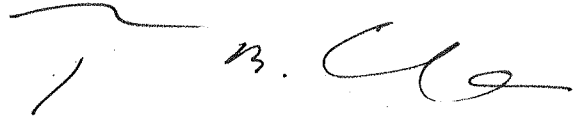
10. I have known Mr. Michaelson since October 1, 2018. Mr. Michaelson is an attorney in good standing with the bar courts listed above. He has never been disciplined, and there are no disciplinary proceedings pending against him. Mr. Michaelson has read and is familiar with the authorities identified in Local Rule 81.1(b)(5), and he agrees to abide by the New York State Lawyer's Code of Professional Responsibility.

11. There has been no prior application in this action for the relief requested herein.

12. Shotspotter Defendants respectfully request that, pursuant to Local Civil Rule 83.1(c) of the United States District Court of the Western District of New York, Mr. Jones, Mr.

Kleinman, and Mr. Michaelson be admitted pro hac vice to act as counsel for Shotspotter Defendants for purposes of participating in, arguing, and trying the above-captioned action.

Executed on December 26, 2018

  
\_\_\_\_\_  
Thomas B. Cronmiller, Esq.